



**THE CITY OF NEW YORK  
LAW DEPARTMENT**

ZACHARY W. CARTER  
*Corporation Counsel*

SPECIAL FEDERAL LITIGATION  
DIVISION  
100 Church Street, 3<sup>rd</sup> Floor  
New York, NY 10007

JOSEPH GUTMANN  
phone: (212) 356-2659  
fax: (212) 356-3509  
email: jgutmann@law.nyc.gov

November 9, 2018

**VIA ECF**

Honorable John G. Koeltl  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: Aitabdella Salem v. City of New York, et al.  
17-CV-4799 (JGK)

Your Honor:

I am a Senior Counsel and the attorney for defendants City of New York and Commissioner Joseph Ponte (hereinafter “City Defendants”) in the above-referenced matter. City Defendants write to respectfully request permission to file a memorandum of law with 1,500 additional words beyond the word limitation set forth in Your Honor’s Individual Practices. Counsel for plaintiff consents to this request.

Plaintiff’s Second Amended Complaint is comprised of 64 pages and 373 separately numbered paragraphs. (See ECF No. 74.) Defendants require approximately 1,500 additional words for their memorandum of law, due to be served and filed on November 13, 2018, in order to fully address the claims set forth in plaintiff’s Second Amended Complaint.

Defendants thank the Court for its consideration herein.

Respectfully submitted,

/s/

Joseph Gutmann  
*Senior Counsel*  
Special Federal Litigation Division

cc: Welton Kemilious Wisham (*By ECF*)  
*Counsel for Plaintiff*